The Restriction Requirement states that the inventions in Group I and Group II are related as a combination and subcombination. The Restriction Requirement further cites MPEP 806.05(c) as providing the basis for determining distinctiveness between Group I and Group II. Specifically, MPEP 806.05(c) requires the Examiner to demonstrate that both (1) the combination as claimed does not require the particulars of the subcombination as claimed for patentability; and (2) the subcombination has utility either by itself or in other and different relations. The Applicants respectfully submit that the Examiner has not made such a showing.

On page 2 of the Restriction Requirement, the Examiner provides a basis for both requirements for combination-subcombination by stating: "combination as claimed does not require the particulars of the subcombination as claimed because the method can utilize any circuit configuration able to apply and buffer a strobe signal," and "[t]he subcombination has separate utility such as addressing circuitry for electrically addressed components other than that involving photolithography."

Claims 1 and 18 are reproduced herein below for the convenience of the Examiner:

1. An electronic circuit, comprising:

circuit elements arranged in an array, said circuit elements being alterable in response to data stored therein and configured to shift data therebetween;

a strobe line electrically coupled to ones of said circuit elements constituting a set to provide thereto a strobe signal to cause said ones of said circuit elements in said set to shift the data to ones of said circuit elements outside said set, said set comprising at least two of said circuit elements positioned diagonally adjacent one another in the array.

18. A method for performing photolithography, said method comprising:

providing an array of light modulation elements, said array comprising strobe lines electrically coupled to respective sets of said light modulation elements, at least one of said sets comprising ones of the light modulation elements positioned diagonally adjacent one another in said array;

loading data representing an image into said array;

altering ones of the light modulation elements in response to said data to transfer an instance of the image onto a substrate;

applying strobe signals to said strobe lines to shift said data between said light modulation elements; and

altering ones of the light modulation elements in response to said data shifted thereinto to transfer another instance of the image onto the substrate.

As can be seen, Claim 18 clearly recites a particular circuit configuration of "*an array of light modulation elements, said array comprising strobe lines electrically coupled to respective sets of said light modulation elements, at least one of said sets comprising ones of the light modulation elements positioned diagonally adjacent one another in said array.*" This circuit configuration is likewise claimed in Claim 1 as "*circuit elements arranged in an array...; and a strobe line electrically coupled to ones of said circuit elements constituting a set..., said set comprising at least two of said circuit elements positioned diagonally adjacent one another in the array.*"

Thus, the Examiner has not shown that the method can utilize any circuit configuration, and as a result, the Examiner has not shown that the combination as claimed does not require the particulars of the subcombination as claimed. Therefore, Applicants respectfully request the Examiner to withdraw the restriction requirement.

If any issue arises, or if the Examiner has any suggestions for expediting allowance of this application, the Applicants respectfully invite the Examiner to contact the undersigned at the telephone number indicated below or at ***hrudnick@texaspatents.com.***

Respectfully submitted,

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